

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

HONEYWELL INTERNATIONAL INC.)	
and HONEYWELL INTELLECTUAL)	
PROPERTIES INC.,)	
)	
Plaintiffs,)	
)	C.A. No. 04-1338-***
v.)	(Consolidated)
)	
APPLE COMPUTER, INC., et al.,)	
)	
Defendants.)	

**PLAINTIFFS' NOTICE OF RULE 30(b)(6) DEPOSITION
OF DEFENDANT SAMSUNG SDI CO., LTD.**

PLEASE TAKE NOTICE that, in accordance with Rules 26, 30(b)(6), and 32 of the Federal Rules of Civil Procedure, Plaintiffs will take the deposition of Samsung SDI Co., Ltd. through one or more of its officers, directors, managing agents, or other persons who consent to testify on its behalf and who are most knowledgeable with respect to the deposition subjects set forth in Schedule B at the time and place as set forth below.

Said deposition will be taken at a mutually-agreeable time and place. The deposition will continue until completed as provided in the Federal Rules of Civil Procedure. The deposition will be taken before a court reporter, notary public, or other person authorized by law to administer oaths, and will be recorded stenographically and by videotape. You are invited to attend and cross-examine.

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/s/ Maria Granovsky

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March 27, 2007
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Schedule B

1. All facts related to any claims of laches and/or estoppel raised by you in this case, including, but not limited to:
 - (a) Identification of all modules (including, but not limited to “Accused Modules”) related to your laches claim;
 - (b) Annual sales of modules identified in (a) above, in terms of number of units and revenue, including whether such sales are in the United States;
 - (c) The distribution channels for each module identified in (a) above;
 - (d) A description of whether the sales identified in response to (b) above in the United States were of uninstalled component modules, or were modules incorporated into an end product (and if so, what end product);
 - (e) For all years referenced in (b) above, identification and discussion of the advertising that identifies or describes the use of two lens arrays/prism films wherein at least one of those lens arrays/prism films is rotated;
 - (f) Statements or actions by Honeywell indicating that it would not file suit against you for infringement of the ‘371 patent;
 - (g) Any communications, conduct, or omissions that have misled you and upon which you relied regarding Honeywell’s intent to enforce the ‘371 patent.

2. All presentations and public displays, including but not limited to those at meetings of the Society for Information Display, in which you publicly discussed or disclosed the components of modules employing two lens arrays/prism films wherein at least one of the arrays/films is rotated, and identification of all documents pertaining thereto.
3. Any evidentiary or economic prejudice you have suffered as a result of any alleged delay in the filing of this suit, including but not limited to any studies of the costs, feasibility and marketability of alternative designs available at the time you began to use modules employing at least two lens arrays/prism films wherein at least one of said arrays/films is rotated.
4. The technical steps or tests useful or necessary to evaluate and determine whether an LCD module contains two lens arrays, at least one of which is rotated, as opposed to other backlighting structures.
5. All information communicated or provided to your customers regarding the internal components of your LCD modules, specifically whether such modules contain two lens arrays, at least one of which is rotated.

CERTIFICATE OF SERVICE

I hereby certify that on March 27, 2007, I electronically filed the foregoing document with the Clerk of Court using CM/ECF, which will send notification of such filing to the following: John R. Alison, Parker H. Bagley, Robert J. Benson, Robert Karl Beste, III, Elizabeth L. Brann, Christopher E. Chalsen, Hua Chen, Arthur G. Connolly, III, Frederick L. Cottrell, III, Francis DiGiovanni, Thomas M. Dunham, Kevin C. Ecker, Amy Elizabeth Evans, York M. Faulkner, Maria Granovsky, Christopher J. Gaspar, Alexander E. Gasser, Alan M. Grimaldi, Thomas C. Grimm, Thomas Lee Halkowski, Angie Hankins, Richard L. Horwitz, Dan C. Hu, John T. Johnson, Robert J. Katzenstein, Nelson M. Kee, Richard D. Kelly, Matthew W. King, Stephen S. Korniczky, Gary William Lipkin, Hamilton Loeb, Robert L. Maier, David J. Margules, David Ellis Moore, Carolyn E. Morris, Arthur I. Neustadt, Elizabeth A. Niemeyer, Andrew M. Ollis, Karen L. Pascale, Adam Wyatt Poff, Leslie A. Polizoti, John F. Presper, Alana A. Prills, Steven J. Rizzi, Lawrence Rosenthal, Avelyn M. Ross, Philip A. Rovner, Diana M. Sangelli, Robert C. Scheinfeld, Carl E. Schlier, Chad Michael Shandler, John W. Shaw, Matthew W. Siegal, Neil P. Sirota, Monte Terrell Squire, William J. Wade, Roderick B. Williams, Edward R. Yoches.

I also certify that on March 27, 2007, I caused to be served true and correct copies of the foregoing on the following as indicated below:

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